

October 05, 2015

Clerk, U.S. Bankruptcy Court

IT IS ORDERED AND NOTICE IS GIVEN that unless within 23 days of the date in the FILED stamp above an interested party BOTH: (1) files a written objection to the Motion below, SETTING FORTH the specific grounds for such objection, with the Clerk of Court (i.e., if the 5-digit portion of the Case No. begins with 3 or 4, at 1001 SW 5th Ave. #700, Portland OR 97204; OR, if it begins with a 6 or 7, at 405 E 8th Ave #2600, Eugene OR 97401), AND (2) serves a copy on the movant and any attorney for the movant at the service address(es) below, the movant will thereafter settle and compromise the matter upon the terms below and the settlement will be deemed approved without further order.

  
 RANDALL L. DUNN  
 U.S. Bankruptcy Judge

## UNITED STATES BANKRUPTCY COURT

## DISTRICT OF OREGON

|   |   |                                   |
|---|---|-----------------------------------|
| In re                                   | ) |                                   |
|   | ) |                                   |
| RITTER CHEMICAL, LLC                    | ) |                                   |
|   | ) |                                   |
|   | ) |                                   |
|   | ) | Case No. 14-30160-rld7            |
| <u>Debtor(s)</u>                        | ) |                                   |
|   | ) | Adv. Proc No. <u>15-03122-rld</u> |
| KENNETH S. EILER, TRUSTEE               | ) |                                   |
|   | ) | MOTION AND NOTICE OF INTENT       |
| Plaintiff(s)                            | ) | TO SETTLE AND COMPROMISE          |
|   | ) | ADVERSARY PROCEEDING,             |
| vs.                                     | ) | <b>AND ORDER THEREON</b>          |
|   | ) |                                   |
| VALENT U.S.A. CORPORATION, a California | ) |                                   |
| corporation                             | ) |                                   |
|   | ) |                                   |
| <u>Defendant(s)</u>                     | ) |                                   |

The undersigned trustee, Kenneth S. Eiler, moves to settle and compromise the above adversary proceeding upon the following terms:

The Trustee maintains that he is entitled to recover from the Defendant, pursuant 11 USC 547, the sum of \$82,500 paid to the Defendant within 90 days of the debtor's bankruptcy filing. The Defendant disputes the Trustee's claim and in particular has raised ordinary course defenses. To settle this matter, the Defendant has agreed to pay the bankruptcy estate the sum of \$41,250 and to waive any right to file a Proof of Claim in the bankruptcy proceeding. Considering the cost to litigate this matter, the uncertain outcome, and the delay occasioned thereby, the Trustee recommends the settlement.

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DATE: September 29, 2015

/s/ KENNETH S. EILER  
Trustee

Service Address: PMB 810, 515 NW SALTZMAN RD  
PORTLAND, OR 97229

Name of Attorney for Trustee: \_\_\_\_\_

Service Address: \_\_\_\_\_  
\_\_\_\_\_